

To: ERD/OERR (EPA5511)
To: D.MCGOWAN (EPA93011)
To: G.CRYSTALL (EPA93028)
To: J.VINISKI (EPA9314)
To: R.FETZER (EPA9324)
To: M.POWELL (EPA9326)
To: C.KLEEMAN (EPA9340)
To: RRC (EPA9374)

From: M.POWELL (EPA9326) Delivered: Thu 9-May-91 8:07 EDT Sys 163 (152)
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SPECIAL BULLETIN A

ELRAMA SCHOOL SITE

ELRAMA TOWNSHIP, WASHINGTON COUNTY, PA

DATE: 8 MAY 1991

FROM: EDWARD M. POWELL, OSC, (3HW31)
EASTERN RESPONSE SECTION

TO: REGIONAL RESPONSE CENTER, U.S. EPA REGION III

THRU: ABRAHAM FERDAS, DIRECTOR, SUPERFUND OFFICE
HAZARDOUS WASTE MANAGEMENT DIVISION (3HW31)

THRU: DENNIS P. CARNEY, CHIEF
SUPERFUND REMOVAL BRANCH (3HW30)

THRU: GREGG CRYSTALL, CHIEF
EASTERN RESPONSE SECTION (3HW31)

SUBJECT: NOTIFICATION OF \$ 50,000 ACTIVATION

INTRODUCTION

AN ASSESSMENT PERFORMED AT THE ELRAMA SCHOOL SITE, ELRAMA, WASHINGTON COUNTY, PA IN ACCORDANCE WITH THE NATIONAL CONTINGENCY PLAN (NCP), 40.CFR PART 300, HAS IDENTIFIED A RELEASE WHICH IS A THREAT TO THE PUBLIC HEALTH. THE LARGE LEACHATE SEEP AT THE ELRAMA SCHOOL SITE POSES A PUBLIC HEALTH THREAT DUE TO THE POTENTIAL FOR DIRECT DERMAL CONTACT WITH THE CONTAMINANTS.

THE DELEGATION OF AUTHORITY 14-1-A (4/8/84) AUTHORIZES THE ON-SCENE COORDINATOR (OSC) TO APPROVE CERCLA REMOVALS WITH A TOTAL COST OF LESS THAN \$50,000. THE OSC HAS DETERMINED THAT THIS SITE MEETS THE CRITERIA FOR INITIATING A REMOVAL ACTION UNDER SECTION 300.415 OF THE NCP. THE OSC HAS APPROVED THE USE OF CERCLA FUNDS TO MITIGATE THE THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT POSED BY THE UNSECURED LEACHATE SEEP THIS SITE.

BACKGROUND

THE SITE IS LOCATED NEAR A FORMER SCHOOL THAT IS NOW USED TO STORE EQUIPMENT AND VEHICLES. THE PORTION OF THE PROPERTY THAT IS OF CONCERN IS AN INACTIVE DUMP AREA TO THE SOUTH OF THE FORMER SCHOOL BUILDING AND IS OWNED BY THE SCHOOL DISTRICT. PENN INDUSTRIAL CHEMICAL DISPOSED OF FILTER CAKE RESIDUE, SOLVENTS AND ACID CLAY WASTES ON THE EDGE OF A RAVINE ON THE SITE. THE DUMPING TOOK PLACE FOR ABOUT 20 YEARS, FROM AROUND 1930 TO 1950. THE WASTE MATERIAL WAS POTENTIALLY DEPOSITED, OR MAY HAVE MIGRATED, INTO SUBSURFACE COAL MINING VOIDS AND SEAMS WHICH ARE PRESENT ON THE SITE. A LARGE TAR-LIKE SEEP IS LOCATED APPROXIMATELY 150 FEET DOWNSLOPE FROM THE DUMP AREA. A CREEK IS LOCATED AT THE BOTTOM OF THE SEEP. A SECOND TAR-LIKE SEEP IS LOCATED 300 FEET DOWNSLOPE FROM THE DUMP. IS PRESENT AT THE HEADWATERS OF THE CREEK.

THE DUMP AND THE SEEP AREAS EXIST ON A HEAVILY VEGETATED SLOPE OF THE RAVINE. TO THE NORTH OF THE DUMP AREA THE PROPERTY CONSISTS OF AN OPEN FIELD AND THE FORMER SCHOOL BUILDING. THE CLOSEST RESIDENCES TO THE NORTH ARE WITHIN 400 FEET (UPGRADIENT). TO THE WEST OF THE LARGE SEEP, THE CLOSEST RESIDENT IS WITHIN APPROXIMATELY 400 FEET AND WITHIN APPROXIMATELY 100 FEET OF THE HEADWATERS OF THE CREEK. TO THE EAST (DOWNGRADIENT) THE CLOSEST RESIDENTS AND BUSINESSES ARE WITHIN APPROXIMATELY 500 AND 1000 FEET RESPECTIVELY. SIXTY RESIDENCES ARE LOCATED WITHIN A QUARTER MILE OF THE SITE.

THE LARGE SEEP AREA IS ABOUT 10 FEET FROM POPPS ROAD WHICH RUNS WEST TO EAST THROUGH THE RAVINE. ACCESS TO THE SITE IS UNRESTRICTED. THE CENTERS OF ELRAMA AND FLOREFFE LIE APPROXIMATELY 1500 AND 2000 FEET RESPECTIVELY FROM THE SITE. THE ESTIMATED COMBINED POPULATIONS FOR THE TWO TOWNS IS 700.

THE CREEK LOCATED AT THE BOTTOM OF THE LARGE SEEP FLOWS ALONG POPPS ROAD, AND IT EVENTUALLY DISCHARGES INTO THE MONONGAHELA RIVER. THE DISTANCE FROM THE SITE TO THE MONONGAHELA RIVER IS APPROXIMATELY 3000 FEET.

NO REMOVAL OR CLEANUP ACTIVITIES HAVE BEEN INITIATED AT THE SITE. THE EPA FIELD INVESTIGATION TEAM CONDUCTED SAMPLING AT THE SITE IN 1987. BASED ON THIS INVESTIGATION THE SITE WAS REFERRED TO THE REMOVAL PROGRAM. THE EPA TECHNICAL ASSISTANCE TEAM CONDUCTED AN ASSESSMENT DURING JANUARY AND OCTOBER 1990. AN ATSDR PACKAGE WAS PREPARED FOR AND REVIEWED BY ATSDR.

THREAT

SAMPLE RESULTS FROM THE TWO TAT INVESTIGATIONS AND THE FIT INVESTIGATION CONFIRM THE PRESENCE OF VOLATILE ORGANIC COMPOUNDS (VOCs) AND POLYCYCLIC AROMATIC HYDROCARBONS (PAHs) IN TAR-LIKE LEACHATE, SOIL, SURFACE WATER, SEDIMENT AND SLUDGE SEDIMENT SAMPLES.

THE MARCH 1, 1991 ATSDR HEALTH CONSULTATION CONCLUDES THAT A PUBLIC HEALTH THREAT IS PRESENT DUE TO THE POTENTIAL FOR DIRECT DERMAL CONTACT WITH THE CONTAMINANTS. THE MAIN AREAS OF CONCERN ARE THE WASTE DUMP AND THE LEACHATE SEEPAGE AREAS. THE MOST LIKELY ROUTE OF EXPOSURE TO THESE CONTAMINANTS COULD OCCUR VIA DIRECT DERMAL CONTACT. EXPOSURES COULD RESULT IN SKIN AND EYE IRRITATION.

THERE IS ALSO A THREAT OF SURFACE AND GROUND WATER CONTAMINATION. THE SEEPAGE AREAS DOWNSLOPE AND DOWNGRADIENT FROM THE WASTE DUMP AREAS ARE SEEPING INTO THE CREEK. THIS CREEK FLOWS ALONG POPPS ROAD AND MERGES WITH ANOTHER SMALL CREEK IN THE RAVINE, PASSES THROUGH A RESIDENTIAL NEIGHBORHOOD AND DISCHARGES INTO THE MONONGAHELA RIVER. THE DISTANCE FROM THE SITE TO THE MONONGAHELA RIVER IS APPROXIMATELY 3000 FEET. A WATER UPTAKE POINT IS LOCATED ABOUT 150 YARDS DOWNSTREAM FROM THE CONFLUENCE OF THE CREEK. THE WATER UPTAKE IS FOR THE PENNSYLVANIA AMERICAN WATER COMPANY.

THERE IS A POTENTIAL GROUND WATER THREAT BECAUSE THERE MAY BE A HYDRAULIC CONNECTION BETWEEN THE WASTE DUMP AREA AND THE RIVER, WHICH IS LOCATED ABOUT 3000 FEET DOWNGRADIENT FROM THE SITE. LOCAL RESIDENTS STATE THAT THE HILLSIDE AND THE SITE ITSELF HAS BEEN MINED FOR COAL. THE WASTE DUMP MAY POSSIBLY OVERLIE MINE WORKINGS, AND THE MINE ITSELF MAY BE FILLED WITH WASTE, ACCORDING TO A NEARBY RESIDENT. THE UNDERLYING BEDROCK AT THE SITE IS ALSO HIGHLY JOINTED AND LAYERED, AND COULD PROVIDE A SUBSURFACE PATH FOR CONTAMINANT MIGRATION.

SCOPE

THE PROPOSED ACTIONS FOR THE ELRAMA SCHOOL SITE ARE DESIGNED TO ELIMINATE THE IMMINENT AND SUBSTANTIAL THREAT TO PUBLIC HEALTH AND THE ENVIRONMENT. THE PROPOSED ACTIONS ARE AS FOLLOWS:

- 1) RESTRICT ACCESS TO THE SITE TO PREVENT THE THREAT OF DIRECT CONTACT WITH THE CONTAMINANTS.
- 2) PURSUE THE POSSIBILITY OF CONDUCTING ADDITIONAL ENGINEERING STUDIES, ANALYTICAL WORK, AND SITE INVESTIGATIONS TO BETTER CHARACTERIZE THE POTENTIAL THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT.
- 3) PURSUE THE POSSIBILITY OF ADDITIONAL SAMPLING TO BETTER CHARACTERIZE THE MIGRATION OF CONTAMINANTS OFFSITE.
- 4) PURSUE ALTERNATIVES TO MITIGATE THE POTENTIAL THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT.

OSC ACTIONS

ON MAY 7, 1991 OSC POWELL ISSUED DELIVERY ORDER # 7445-03-074 TO
ZONE ERCS CONTRACTOR ON MATERIALS IN THE AMOUNT OF \$35,000 TO
INITIATE A REMOVAL ACTION APPROPRIATE TO MITIGATE THE DIRECT
CONTACT THREAT POSED BY THE LEACHATE SEEP ONSITE. OSC
COORDINATED EXCHANGE OF INFORMATION WITH STATE AND LOCAL
OFFICIALS.

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